

REMARKS

This is in response to the Office Action that was mailed on July 27, 2006. Claims 1-39 were pending in that action. All pending claim were rejected. With the present response, claims 1, 10, 15, 17, 27, 29, 33, 38 and 39 are amended. The remaining claims are unchanged.

It is respectfully pointed out that the Examiner has not indicated one way or the other as to whether Applicant's drawings have been accepted. An indication of acceptance of the drawings is respectfully solicited.

Applicant filed an Information Disclosure Statement on August 1, 2006. The Office Action was mailed on July 27, 2006. Thus, it would appear that the IDS and the Office Action essentially crossed in the mail. As a remedy, with the present response, Applicant is re-submitting the IDS, along with an appropriate fee. Consideration of the IDS is respectfully solicited.

On page 3 of the Office Action, the Examiner indicated that Applicant's Preliminary Amendment of 6/20/03 has not been entered. Applicant would only like to say that the format of the Amendment of 6/20/03 is consistent with the requirements of the Office during that time period. In fact, it used to be an Office requirement that amendments be formatted as "replacement paragraphs." However, in the spirit of cooperation, Applicant has incorporated the 6/20/03 amendments into the present response. The present response assumes that the Preliminary Amendment of 8/27/03 was entered. Following entry of the present amendments, the amendments of both 6/20/03 and 8/27/03 will be accounted for.

On page 2 of the Office Action, the Examiner rejected claims 1-39 based on the judicially created doctrine of obviousness-type double patenting in light of claims 1-28 of co-pending U.S. Pat. App. No. 10/626,925 (hereinafter referred to as "the '925 application"). In response, Applicant is submitting herewith a terminal disclaimer that effectively equalizes the relevant patent terms. It is therefore respectfully submitted that the double patenting rejection is now a mute issue. Reconsideration and withdrawal of the double patenting rejection are respectfully solicited.

On page 3 of the Office Action, the Examiner rejected claims 1-39 under 35 U.S.C. §102(b) as being anticipated by U.S. Pat. No. 6,247,174 (hereinafter referred to as "the Santhanam reference"). For reasons that will be outlined below in detail, it is respectfully submitted that these claims are patentably distinguishable from that reference.

Independent claim 1 recites a method that includes receiving, from an automatic machine translation system, an attempted translation that corresponds to a collection of source text. As claimed, the attempted translation corresponds to a collection of source text. As amended, claim 1 specifies the translation as being expressed in a first natural language and the collection of source text as being in a natural language that is different than the first. It is respectfully pointed out that the amendments to claim 1 are well within the scope of Applicant's specification as filed. A portion of the background portion of Applicant's specification is even dedicated to a discussion of natural language text translation. The concept of a natural language is well-known to those skilled in the art.

In contrast to claim 1, the Santhanam reference describes systems and methods for processing software code. Nothing in the reference has anything to do with translating text expressed in a first natural language into corresponding text expressed in a different natural language. Thus, claim 1 is believed to be in allowable form at least for this reason.

Further, claim 1 also recites a method step that includes providing information to an automatic machine translation system to reduce the likelihood that an error will be repeated in subsequent natural language translations generated by the system. The Santhanam reference fails to teach or suggest any system that produces natural language translations, let alone one that is incorporated into a method as defined in claim 1.

Further, even assuming, for the same of argument, that one of the code translation mechanisms described in the Santhanam reference were considered to be an automatic machine translation system, the cited reference still fails to teach or suggest providing information to reduce repeated errors. In response to this claim limitation, the Examiner points to col. 14, lines 3-16 and col. 15, lines 8-16. A close reading of these passages, and indeed the entire Santhanam

reference, reveals a teaching of some form of error correction but there is no teaching or suggestion of action taken to prevent the same errors from occurring again in subsequent translations. Further, the error correction that is described in the Santhanam reference would seem to be tied primarily to the checking of semantic characteristics of code as entered, as opposed to as translated. For at least this additional reason, claim 1 is believed to be patentably distinguishable from the Santhanam reference.

Claims 2-16 are dependent upon independent claim 1 and were similarly rejected. It is respectfully submitted that these dependent claims are patentably distinguishable from the Santhanam reference at least for the same reasons that their affiliated independent claim is so distinguishable. Further, it is respectfully submitted that at least some of dependent claims 2-16 are allowable based on their merit of their own claim limitations.

For example, claim 4 limits the claim step of receiving from an automatic machine translation system to receiving by way of a computer network. In response to this claim limitation, the Examiner cites col. 6, lines 18-45. Nothing in this or any other section of the Santhanam reference teaches or suggests receiving by way of a computer network as claimed. The Examiner argues that "received from does not change the overall functionality of the claimed invention." Applicant traverses this apparent attempt to take official notice of the limitation of claim 4. In light of the absence of prior art that teaches or suggests the limitation of claim 4, it is respectfully submitted that the claim is in allowable form. Claims 5-7 recite limitations that are similarly distinguishable from the cited prior art.

Dependent claim 11 defines a method step of providing update information to be assimilated into a collection of linguistic structures. Claim 12 defines a method step of providing update information to be assimilated into a database of logical forms. In response to claims 11 and 12, the Examiner cites no specific sections of the prior art but instead simply argues that "the flagged portions [that is] are inherently update information..." Applicant sees no correspondence between this statement and the features of claims 11 and 12. Should the Examiner be attempting to take Official Notice, Applicant traverses any such attempt. In light of the absence of prior art

that teaches or suggests the limitations of claims 11 and 12, it is respectfully submitted that these claims are in allowable form for this additional reason.

Claim 13 defines a method step of providing update information to be assimilated into a database of statistical parameters. In response, the Examiner points to a validation function described in the Santhanam reference at claim 47. However, in no way does claim 47, nor any other portion of the cited reference, teach or suggest an updating of statistical parameters as claimed. Claim 13 is believed to be in allowable form for this additional reason.

Perhaps most notably, claim 16 defines a method step of providing bilingual corpora. In response, the Examiner points to the Santhanam reference at col. 6, lines 18-46. However, in no way does this passage, nor any other portion of the cited reference, teach or suggest any process involving bilingual corpora. Claim 16 is believed to be in allowable form for this additional reason.

Claims 4-7, 11-13 and 16 are simply examples of dependent claims that are believed to be in allowable form based on the merits of their own limitations.

Independent claim 17 recites a method that includes employing an automatic translation system to generate a translation of a collection of source text. As amended, claim 1 specifies the collection of source text as being expressed in a first natural language and the translation expressed in a natural language that is different than the first. It is respectfully pointed out that the amendments to claim 17 are well within the scope of Applicant's specification as filed. A portion of the background portion of Applicant's specification is even dedicated to a discussion of natural language text translation. The concept of a natural language is well-known to those skilled in the art.

In contrast to claim 17, the Santhanam reference describes systems and methods for processing software code. Nothing in the reference has anything to do with translating text expressed in a first natural language into corresponding text expressed in a different natural language. Thus, claim 17 is believed to be in allowable form at least for this reason.

Further, claim 17 also recites a method step that includes transferring the source text and corresponding translation to a reliable modification source. An indication of an error is received from the modification source. The automatic machine translation system is then trained such that an error will be less likely to be repeated in subsequent translations.

Even assuming, for the same of argument, that one of the code translation mechanisms described in the Santhanam reference were considered to be an automatic machine translation system, the cited reference still fails to teach or suggest employment of a reliable modification source that provides information to reduce repeated errors. A close reading of the entire Santhanam reference reveals a teaching of some form of error correction but there is no teaching or suggestion of action taken to prevent the same errors from occurring again in subsequent translations. Further, the error correction that is described in the Santhanam reference would seem to be tied primarily to the checking of semantic characteristics of code as entered, as opposed to as translated. For at least this additional reason, claim 17 is believed to be patentably distinguishable from the Santhanam reference.

Claims 18-28 are dependent upon independent claim 17 and were similarly rejected. It is respectfully submitted that these dependent claims are patentably distinguishable from the Santhanam reference at least for the same reasons that their affiliated independent claim is so distinguishable. Further, it is respectfully submitted that at least some of dependent claims 18-28 are allowable based on their merit of their own claim limitations.

For example, claim 18 adds method steps that include generating a confidence metric representing a quality measurement with regard to the translation. In response, the Examiner points to a validation function described in the Santhanam reference at claim 47. However, in no way does claim 47, nor any other portion of the cited reference, teach or suggest generating or using a confidence metric as claimed. Claim 18 is believed to be in allowable form for this additional reason.

Claim 19 limits the claim step of transferring to transferring from a client computing device to a server computing device. Nothing in any section of the Santhanam

reference teaches or suggests the client server implementation as claimed. The Examiner argues that "received from does not change the overall functionality of the claimed invention." Applicant traverses this apparent attempt to take official notice. In light of the absence of prior art that teaches or suggests the limitations of claim 19, it is respectfully submitted that the claim is in allowable form. Claims 20 recites limitations that are similarly distinguishable from the cited prior art.

Dependent claim 23 defines a method step of providing update information to be assimilated into a collection of linguistic structures. Claim 24 defines a method step of providing update information to be assimilated into a database of logical forms. In response to claims 23 and 24, the Examiner cites no specific sections of the prior art but instead simply argues that "the flagged portions [that is] are inherently update information..." Applicant sees no correspondence between this statement and the features of claims 23 and 24. Should the Examiner be attempting to take Official Notice, Applicant traverses any such attempt. In light of the absence of prior art that teaches or suggests the limitations of claims 23 and 24, it is respectfully submitted that these claims are in allowable form for this additional reason.

Claim 25 defines a method step of providing update information to be assimilated into a database of statistical parameters. In response, the Examiner points to a validation function described in the Santhanam reference at claim 47. However, in no way does claim 47, nor any other portion of the cited reference, teach or suggest an updating of statistical parameters as claimed. Claim 25 is believed to be in allowable form for this additional reason.

Claim 28 defines a method step of providing bilingual corpora. In response, the Examiner points to the Santhanam reference at col. 6, lines 18-46. However, in no way does this passage, nor any other portion of the cited reference, teach or suggest any process involving bilingual corpora. Claim 28 is believed to be in allowable form for this additional reason.

Claims 18-20, 23-25 and 28 are simply examples of dependent claims that are believed to be in allowable form based on the merits of their own limitations.

Independent claim 29 recites a method that includes employing an automatic translation system to generate a translation of a collection of source text. As amended, claim 1 specifies the collection of source text as being expressed in a first natural language and the translation expressed in a natural language that is different than the first. It is respectfully pointed out that the amendments to claim 29 are well within the scope of Applicant's specification as filed. A portion of the background portion of Applicant's specification is even dedicated to a discussion of natural language text translation. The concept of a natural language is well-known to those skilled in the art.

In contrast to claim 29, the Santhanam reference describes systems and methods for processing software code. Nothing in the reference has anything to do with translating text expressed in a first natural language into corresponding text expressed in a different natural language. Thus, claim 29 is believed to be in allowable form at least for this reason.

Further, claim 29 recites a confidence metric with a portion of a generated translation. One claimed method step includes evaluating the confidence metric and selecting a low confidence portion. As claimed, the low confidence portion is transmitted across a computer network to a reliable modification source. In the rejection of claim 29, the Examiner completely fails to address all of these limitations of claim 29. In fact, the Santhanam reference fails to teach or suggest any related functionality. Claim 29 is believed to be in allowable form for this additional reason.

Claims 30-38 are dependent upon independent claim 29 and were similarly rejected. It is respectfully submitted that these dependent claims are patentably distinguishable from the Santhanam reference at least for the same reasons that their affiliated independent claim is so distinguishable. Further, it is respectfully submitted that at least some of dependent claims 30-38 are allowable based on their merit of their own claim limitations.

For example, claim 30 limits the claimed reliable modification source as being a human translator. The Santhanam reference fails to teach any reliable modification source to which data is transferred across a computer network. Certainly there is no indication of the more

specific human translator source. Claim 30 is believed to be in allowable form for this additional reason.

Claims 31, 32, 35 and 36 are distinguishable from the cited Santhanam reference for reasons that have been discussed herein in detail relative to other rejected claims. These claims, as well as claim 30, are simply examples of dependent claims that are believed to be in allowable form based on the merits of their own limitations.

As amended, claim 39 specifies the translation is of a collection of source text expressed in a first natural language. As amended, the translation is expressed in a natural language that is different than the first natural language. It is respectfully pointed out that the amendments to claim 39 are well within the scope of Applicant's specification as filed. A portion of the background portion of Applicant's specification is even dedicated to a discussion of natural language text translation. The concept of a natural language is well-known to those skilled in the art.

In contrast to claim 39, the Santhanam reference describes systems and methods for processing software code. Nothing in the reference has anything to do with translating text expressed in a first natural language into corresponding text expressed in a different natural language. Thus, claim 39 is believed to be in allowable form at least for this reason.

Further, independent claim 39 recites a method that includes implementing a first automatic translator on a first computing device. A second automatic translator is implemented on a second computing device. The second computing device is provided with a corrected version of an attempted translation produced by a reliable translation source. The claim goes on to define processing and data transfers relative to the first and second computing devices and the reliable translation source. In the rejection of claim 39, the Examiner completely fails to address all of these limitations. In fact, the Santhanam reference fails to teach or suggest any related functionality or system architecture. Claim 39 is believed to be in allowable form for this additional reason.



Claims 40 and 41 are dependent upon independent claim 39 and were similarly rejected. It is respectfully submitted that these dependent claims are patentably distinguishable from the Santhanam reference at least for the same reasons that their affiliated independent claim is so distinguishable. Further, it is respectfully submitted that these dependent claims are allowable based on their merit of their own claim limitations. Both claims recited processing involving a bilingual corpus, which is not something that is taught or suggested in the Santhanam reference. Notably, the Office Action completely omitted claims 40 and 41. In light of the absence of any prior art teaching or suggestion, it is respectfully submitted that claims 40 and 41 are currently allowable.

In summary, it is respectfully submitted that claim 1-41 are in condition for allowance. Reconsideration and favorable action are respectfully solicited. The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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By: \_\_\_\_\_



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